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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

	)	Chapter 11
In re:	)	
	)	Case No. 18-23538-RDD
Sears Holding Corporation, <i>et al.</i> ,	)	
	)	(Jointly Administered)
Debtors.	)	
	)	

**ENTRY OF APPEARANCE, REQUEST FOR  
SERVICE OF PAPERS, AND RESERVATION OF RIGHTS**

**PLEASE TAKE NOTICE** that the Law Office of Curtis A. Hehn (the “Firm”) hereby appears as counsel for TJD Holdings Inc. (“TJD”), and requests that all notices given or required to be given and all papers served or filed in connection with this Chapter 11 case be given to and served upon:

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**PLEASE TAKE FURTHER NOTICE** that, pursuant to section 1109(b) of the Bankruptcy Code, and Rules 2002, 3017 and/or 9007 of the Federal Rules of Bankruptcy Procedure, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, complaint or demand, motion, petition, pleading or request, and answering or

reply papers filed in this case, whether formal or informal, written or oral, and whether served, transmitted, or conveyed by mail, hand delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the above-captioned case and proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that this *Entry of Appearance, Request for Service, and Reservation of Rights* shall not be deemed or construed to be a waiver of any of the rights of RITC, including, without limitation, to (i) have final orders in non-core matters entered only after *de novo* review by a higher court, (ii) trial by jury in any proceeding so triable in this case, or any case, controversy, or adversary proceeding related to this case, (iii) have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which TJD may be entitled in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: January 13, 2020

LAW OFFICE OF CURTIS A. HEHN

*/s/ Curtis A. Hehn*

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<sup>1</sup> Admitted *pro hac vice* in the above-noted bankruptcy case pursuant to that certain *Order Granting Admission to Practice, Pro Hac Vice* [Docket No. 6330] signed by the Court on January 10, 2020.